

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>Case No.09-00143-8-CR-W-ODS</b>
	)	
<b>ANDREW COLE,</b>	)	
	)	
<b>Defendant.</b>	)	

**DEFENDANT’S MOTION FOR TRAVEL OUT OF TIME**

**COMES NOW** Defendant, by and through appointed counsel Susan M. Hunt, and hereby requests this Honorable Court enter its Order approving her travel to Columbia, Missouri to meet with client on May 4-5, 2010.

**SUGGESTIONS IN SUPPORT OF MOTION**

1. Defendant has been ruled indigent by this Court and counsel has been appointed to represent him.
2. Defendant previously filed a Motion for travel to meet with the client for the months of February and March, 2010. That Motion was approved and counsel made three trips during that time frame to meet with defendant.
3. Counsel also traveled to Columbia, Missouri on May 4, 2010, to meet with the client on May 5, 2010. That was the last trip taken, as after that trip defendant began cooperating with the government.
4. Apparently counsel forgot to file a travel Motion to have that trip approved.

5. At the time of this trip defendant was on bond and lived in St. Charles, Missouri. He agreed to meet counsel half way so we could go over the discovery and discuss his cooperation.

6. Counsel is requesting funds for mileage, lodging and meals for this trip. Counsel asserts this travel expense was reasonable and necessary to prepare defendant for his proffer and cooperation.

7. Counsel is requesting this Court authorize counsel, pursuant to Section 702 of the Federal Courts Administration Act of 1992, Public Law 102-572, 106 Stat. 4506, to obtain reimbursement for the above described trip in connection with her providing representation to defendant under the Criminal Justice Act.

WHEREFORE, for the above stated reasons, counsel requests this Court authorize travel expense for Susan Hunt to travel to Columbia, Missouri on May 4-5, 2010.

Respectfully submitted:

\_\_\_\_\_/s/  
Susan M. Hunt  
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I hereby certify that a copy of the above was filed, on June 14, 2011 in this Court's ECF filing system and served on all parties.

\_\_\_\_\_/s/  
Susan M. Hunt